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REMARKS

Applicants have amended claims 8, 18, 28, 31 and 33 by correcting inadvertent grammatical errors so as to better claim the invention. Applicants also have added claims 34-35 to further claim the invention and respectfully request the Examiner to review and consider them. Accordingly, claims 2-5, 7-10, 12-15, 17-20, 22-25, 27-31 and 33-35 are pending in the present patent application. Favorable reconsideration of the application is respectfully requested in view of the foregoing amendments and the following remarks.

Claim Rejections – 35 USC § 103

Claims 2-5, 7-10, 12-15, 17-20, 22-25, 27-31 and 33 stand rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 6,487,249 issued to Kim et al. (hereinafter "Kim") in view of U.S. Patent No. 6,487,249 issued to Thyagarajan et al. (hereinafter "Thyagarajan") and further in view of U.S. Patent No. 5,781,241 issued to Donovan (hereinafter "Donovan"). Before addressing this rejection in detail, it should be noted that the Examiner bears the initial burden of factually supporting any *prima facie* conclusion of obviousness. *MPEP 2142*. To establish *prima facie* case of obviousness, certain criteria must be met. One of the criteria requires the prior art reference or references when combined must teach or suggest all the claim limitations. With the above requirement in mind, Applicants respectfully traverse these rejections per discussion below.

Regarding independent claim 8, the Examiner relies on Kim to teach its dividing limitation, Donovan to teach its filtering limitation and Thyagarajan to teach its filtering decimating limitation. *See Office Action, pages 2-3*. Assuming *arguendo* that the Examiner's reliance on Kim and Thyagarajan are correct, Applicants respectfully submit that Donovan fails to teach or suggest the filtering limitation. Before distinguishing the present invention as specified in claim 8, Applicants would like to discuss Donovan in details.

Turning to Donovan, it generally relates to the conversion of computer video signals to horizontally and vertically scaled television signals. *Column 1, lines 7-10*. For example, before a television could display an incoming computer video image having 480 active video lines, a converter would need to scale such incoming image so as to generate an output image having 400

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active video lines. *Column 3, lines 50-54.* Such output image to be displayed by the television obviously has fewer number of active video lines than the incoming computer video image has. This redistribution of the image across a different number of lines introduces artifacts that were not present in the original image. *Column 3, lines 58-60.* Such artifacts are reduced by modifying the filter used for reducing flicker. *Column 3, lines 61-63.* To do so, filter coefficients are modified on a line by line basis. *Column 3, lines 61-63.* For each television line being generated, the surrounding VGA lines are weighted in relation to their distance from the television line. *Column 3, lines 63-65.* By doing this, the location of objects and transitions in the picture do not move so as to reduce distortions and artifacts in the televised image. *Column 3, lines 65-67.*

Based on the above discussion of Donovan, the Examiner's reliance on Donovan to teach or suggest the filtering limitation is not correct. More specifically, the present invention as specified in claim 8 filters each element of each column of a block of the image. *See, e.g., paragraph [0055].* That is, filtering is accomplished on a block by block basis. In contrast, the filter coefficients of Donovan are being used on a line by line basis.

Accordingly, Donovan fails to teach or suggest the filtering limitation as specified in claim 8 and thus claim 8 is believed to be non-obvious and patentably distinguishable over Kim in view of Thyagarajan and further in view of Donovan.

Regarding claims 2-5, 7 and 9-10, they depend from independent claim 8, which is believed to be patentable as discussed above, and thus they should also be non-obvious and patentably distinguishable over Kim in view of Thyagarajan and further in view of Donovan. *MPEP 2143.03.*

Regarding independent claim 18, it comprises limitations that are similar to those of independent claim 8, which is believed to be patentable as discussed above, and thus claim 18 should also be non-obvious and patentably distinguishable over Kim in view of Thyagarajan and further in view of Donovan.

Regarding claims 12-15, 17 and 19-20, they depend from independent claim 18, which is believed to be patentable as discussed above, and thus they should also be non-obvious and

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patentably distinguishable over Kim in view of Thyagarajan and further in view of Donovan.
MPEP 2143.03.

Regarding independent claim 28, it comprises limitations that are similar to those of independent claim 8, which is believed to be patentable as discussed above, and thus claim 28 should also be non-obvious and patentably distinguishable over Kim in view of Thyagarajan and further in view of Donovan

Regarding claims 22-25, 27 and 29-30, they depend from independent claim 8, which is believed to be patentable as discussed above, and thus they should also be non-obvious and patentably distinguishable over Kim in view of Thyagarajan and further in view of Donovan.
MPEP 2143.03.

Regarding newly added independent claims 33 and 34, each of them comprises limitations that are similar to those of independent claim 8, which is believed to be patentable as discussed above, and thus claims 33-34 should also be non-obvious and patentably distinguishable over Kim in view of Thyagarajan and further in view of Donovan.

PATENT**CONCLUSION**

Claims 2-5, 7-10, 12-15, 17-20, 22-25, 27-31 and 33-35 are presently standing in this patent application. In view of the foregoing remarks, each and every point raised in the Office Action mailed on August 4, 2005 has been addressed on the basis of the above remarks. Applicants believe all of the claims currently pending in this patent application to be in a condition for allowance. Reconsideration and withdrawal of the rejections are respectfully requested. However, should the Examiner believe that direct contact with Applicants' attorney would advance the prosecution of the application, the Examiner is invited to telephone the undersigned at the number given below.

Respectfully submitted,

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